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8 Attorneys for Plaintiff  
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ANTHONY DAVID FLORES,  
aka "Anton David," and  
16 ANNA RENE MOORE,

17 Defendants.

No. 2:22-CR-00593-PA

STIPULATION AND JOINT REQUEST TO  
CONTINUE DEADLINES TO FILE  
DISCOVERY AND PRIVILEGE MOTIONS

[PROPOSED ORDER FILED SEPARATELY]

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19 Plaintiff United States of America, by and through its counsel  
20 of record, the United States Attorney for the Central District of  
21 California and Assistant United States Attorney Andrew M. Roach, and  
22 defendant Anna Rene Moore ("defendant Moore"), by and through her  
23 counsel of record, Deputy Federal Public Defender Charles J. Snyder,  
24 and defendant Anthony David Flores, also known as "Anton David"  
25 ("defendant Flores"), by and through his counsel of  
26 record, Ambrosio E. Rodriguez, hereby stipulate as follows:

27 1. The Court held a status conference in this matter on April  
28 25, 2023. (Dkt. 44.) At the status conference, the government

1 anticipated that it could produce the remaining discovery by the end  
2 of May 2023. Based on the government's estimate, the Court set a  
3 deadline of June 12, 2023, for the filing of any discovery motions,  
4 and July 17, 2023, for the filing of any motions for privilege.

5 2. Following the April 25, 2023 status conference, the  
6 government continued to make productions, including an additional  
7 production of approximately 200,000 pages of discovery on  
8 May 1, 2023. To date, the government has produced over 429,000  
9 pages of discovery to defendants.

10 3. The government represents, however, that, despite its best  
11 efforts, it has been unable to produce the remaining discovery by  
12 end of May 2023, as it anticipated. The government represents that  
13 the final review and production of this data has taken longer than  
14 anticipated due to the volume of data, unforeseen technological  
15 issues, an agent illness, and continued consultations with the  
16 privilege review team regarding the email search warrants executed  
17 on defendants' email accounts in October 2022. As a result of these  
18 delays, the government anticipates producing this discovery by the  
19 end of June 2023.

20 4. The parties therefore request that the Court continue the  
21 motions deadlines to allow the government to complete its production  
22 of the remaining discovery and allow the parties to file any  
23 motions, if necessary.

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1           5.     Accordingly, the parties agree and stipulate to the  
2 following the motions schedule: (1) any discovery motions shall be  
3 filed by July 17, 2023, and (2) any privilege motions shall be filed  
4 by August 21, 2023.

5           IT IS SO STIPULATED.

6  
7 Dated: June 2, 2023

Respectfully submitted,

8 E. MARTIN ESTRADA  
United States Attorney

9 ANNAMARTINE SALICK  
10 Assistant United States Attorney  
Chief, National Security Division

11  
12 /s/ Andrew M. Roach  
ANDREW M. ROACH  
Assistant United States Attorney

13  
14 Attorneys for Applicant  
UNITED STATES OF AMERICA

15 DATED: June 2, 2023

16  
17 /s/ with email authorization  
18 CHARLES J. SNYDER  
Deputy Federal Public Defender

19 Attorney for Defendant  
20 ANNA RENE MOORE

21 DATED: June 2, 2023

22  
23 /s/ with email authorization  
AMBROSIO E. RODRIGUEZ

24 Attorney for Defendant  
25 ANTHONY DAVID FLORES  
26  
27  
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